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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

17 IN RE: CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
MDL No. 1917

The Honorable Samuel Conti

19
20 This Document Relates to:

Individual Case No. 3:14-cv-02510

21
22 *ViewSonic Corporation v. Chunghwa*
23 *Picture Tubes, Ltd. et al.*, No. 14-cv-02510

24 *Target Corp. v. Chunghwa Picture Tubes,*
25 *LTD., et al.*, Individual Case No. 11-cv-
26 05514

**DECLARATION OF JASON C. MURRAY
IN SUPPORT OF VIEWSONIC
CORPORATION'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PURSUANT TO CIVIL LOCAL RULES 79-
5(d) AND 7-11**

1 I, Jason C. Murray, hereby declare as follows:

2 1. I am an attorney with the law firm of Crowell & Moring LLP, which represents
3 ViewSonic Corporation and Target Corporation ("Plaintiffs") in the above-captioned action
4 currently pending in the United States District Court for the Northern District of California. I am
5 a member in good standing of the California bar, and am admitted to practice before this Court.
6 The matters stated herein are true to my own personal knowledge, and, if called as a witness, I
7 could and would competently testify thereto.

8 2. I submit this declaration in accordance with Civil Local Rule 79-5 to set forth facts in
9 support of ViewSonic's Administrative Motion to File Under Seal Pursuant to Civil Local Rules
10 79-5(d) and 7-11.

11 3. On June 18, 2009, the Court approved a "Stipulated Protective Order" in this matter (Dkt.
12 No. 306) (the "Protective Order").

13 4. Pursuant to the Protective Order and Local Rules 7-11 and 79-5(d), Plaintiffs seek to seal
14 the following concurrently-filed documents: (a) the highlighted portions of Plaintiffs' Joint
15 Opposition to LGE Defendants' Motion for Partial Summary Judgment on Standing Grounds
16 ("Plaintiffs' Opposition."), and (b) Exhibits 2, 4-5, 12-65, Appendix A and Appendix B to the
17 Declaration of Jason C. Murray in Support of Plaintiffs' Opposition ("Murray Opposition
18 Declaration").

19 5. Pursuant to Civil Local Rules 79-5 and 7-11, this Court's General Order No. 62,
20 Electronic Filing of Documents Under Seal, effective May 10, 2010, and the Protective Order, I
21 make this declaration on behalf of Plaintiffs to provide the Court with a basis to maintain under
22 seal the highlighted portions of Plaintiffs' Joint Opposition to LGE Defendants' Motion for
23 Partial Summary Judgment on Standing Grounds ("Plaintiffs' Opposition.").

24 6. Exhibits 2, 4-5, 12-65, Appendix A and Appendix B to the Murray Opposition
25 Declaration are documents and testimony designated by defendants Chunghwa Picture Tubes,
26 Ltd. and Chunghwa (Malaysia) Sdn. Bhd. and LG Electronics USA, Inc. as "Confidential" or
27 "Highly Confidential" under the terms of the Protective Order. The highlighted portions of the
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1 Opposition reference confidential information contained in these exhibits.

2 7. Portions of Plaintiffs' Opposition contain excerpts from and/or statements derived from
3 documents and testimony which have been designated as either "Confidential" or "Highly
4 Confidential" pursuant to the Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306)
5 ("Protective Order"). The confidential/highly confidential designations were made by certain
6 defendants in this litigation.

7 8. Plaintiffs seek to submit the material referenced herein under seal in good faith in order to
8 comply with the Protective Order in this action and the applicable Local Rules.

9 I declare under penalty of perjury of the laws of the United States that the foregoing is true
10 and correct.

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12 Executed this 23rd day of December, 2014, in Los Angeles, California.

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14 /s/ Jason C. Murray
15 Jason C. Murray
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